

PRIVILEGE LOG

AMENDED JULY 6, 2020

Chief Brian Hickman submits the below amended privilege log, excerpting or redacting from the documents produced by the Tennessee Bureau of Investigations pursuant to a subpoena issued under Rule 45 of the Federal Rules of Civil Procedure, information that involves communications related to the privilege maintained by Mr. Hickman that he does not waive and are therefore protected by the attorney/client privilege. To the extent any additional privileged documents are later identified, Chief Hickman reserves the right to claw back those documents.

Bates #	Document Type	Date of Document	Document Author/Creator	Basis of Privilege	Basis of Privilege
CID-10	Summary of Investigation	11/13/19	Tennessee Bureau of Investigation	Written summary of interview of City Attorney Sam Elliott detailing discussions with City officials and legal advice about municipal policy.	Partial redaction of statements of City Attorney Sam Elliott on the basis of attorney/client privilege
CID-21	E-mail	01/08/19	Sam Elliott and Brian Hickman	Emails between Sam Elliott and Brian Hickman seeking legal advice and legal opinions on municipal policy and business.	Partial redaction: Attorney/client communications
CID-41	E-mail	01/08/19	Sam Elliott and Brian Hickman	This is the same email chain contained in CID-21, and consists of emails between Sam Elliott and Brian Hickman seeking legal advice and opinions on municipal policy and business.	Attorney/client communications
CID-70-77	E-mail	01/07/19 and 01/08/19	Sam Elliott, Ethan White, Ted Rogers, and Brian Hickman	Series of emails between the referenced parties involving discussions about municipal policy that contains advice and legal opinions from City Attorney Sam Elliott.	Attorney/client communications

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CID-92-93	E-mail	01/07/19 and 01/08/19	Sam Elliott, Ethan White, Ted Rogers, and Brian Hickman	These emails are also contained in CID – 70-77, and consist of a series of emails between the referenced parties involving discussions about municipal policy that contains advice and legal opinions from City Attorney Sam Elliott.	Attorney/client communications
CID-129-133	E-mail	01/07/19 and 01/08/19	Sam Elliott, Ethan White, Ted Rogers, and Brian Hickman	These emails are also contained in CID -21 and CID – 70-77, and consist of a series of emails between the referenced parties involving discussions about municipal policy that contains advice and legal opinions from City Attorney Sam Elliott.	Attorney/client communications
CID-137-139	E-mail	01/07/19 and 01/08/19	Sam Elliott, Ethan White, Ted Rogers, and Brian Hickman	These emails are also contained in CID – 70-77, and consist of a series of emails between the referenced parties involving discussions about municipal policy that contains advice and legal opinions from City Attorney Sam Elliott.	Attorney/client communications
CID-239	Audio Interview Summary	08/30/19	Tennessee Bureau of Investigation	This is the same summary as CID-10, and consists of a written summary of interview of City Attorney Sam Elliott detailing discussions with City officials and legal advice about municipal policy.	Partial redaction based on attorney/client communication